

505 Ponderosa Dr.
Jackson, WY 83001

November, 1999

Mr. Hawkes,

Comments regarding Winter Use Plan DEIS for Yellowstone & Grand Teton Nat'l Parks & J.D. Rockefeller, Jr. Memorial Parkway

My remarks should be prefaced by the fact that I cannot specifically choose one of the stated alternatives in the printed plan document. My pursuit would be to encourage an amalgamation of several specifics listed in a variety of the plan alternatives. Further, I live in the Jackson area, so I would perceive that I am very familiar with the political/geographical and economic issues surrounding the necessity of the WUP. I have made comments previously, and have been a co-plaintiff on the Fund For Animals lawsuit. I feel very qualified to make important comments for consideration in resolving this matter.

I cannot support any of the alternatives as they are currently compiled. I would like to point out the particular items of import be they good or bad. They are as follows...

Good initiatives to pursue:

1. The increase of interpretive opportunities(YNP)
2. Prohibit oversnow travel, from 9pm to 6am(YNP)
3. Allow only all-wheeled vehicles or treaded snow coaches fm. W. Yellowstone to Old Faithful
4. Continue scientific studies, especially of bison migration routes(YNP). YNP's Supt. should recognize the judge's ruling in the case with the FFA & close areas for study as required. He shouldn't be allowed to choose which rulings he wishes to comply with.
5. Separate motorized & non-motorized traffic. There is currently gross abuse of the requirement that snowmobiles not use the public roadbed, which ought to be enforced.
6. Phase out snowmobiles, snowplanes from the Potholes as well as Jackson & Jenny Lakes, ASAP.
7. As soon as EPA has new snowmobile standards, adopt them without delay. The industry could make them quieter(60db max) & more efficient but hasn't. Users will have to subordinate their recreation to the park's needs. Abruptly shut down snowmobile access in 2 yrs. to any machinery that does not comply with EPA or park mandated standards. Special dispensation allowed for snowcoaches, but they too should be disallowed within 5 yrs. if standards are not met.(YNP, GTNP)
8. Designated winter range should only be for non-motorized access, if that. Minimally invasive access should be allowed whenever possible.(YNP, GTNP)
9. The CDST should be closed in both parks. Only shuttle operations should be allowed to get people to points in those parks.
10. Establish winter campsites at Old Faithful.
11. Establish an advisory committee. Select not just gateway community officials or enviro

types, but individual citizens familiar with the local & geo-political dynamics.(YNP, GTNP)

12. Step up enforcement of any speed limits, safety violations, outfitter violations, etc.(YNP, GTNP)

13. Mitigate, but don't hesitate to terminate, if wildlife & environmental protections aren't observed stringently. YNP & GTNP should be Class One air quality areas at all times. Steps should be undertaken to that end for summer private & commercial vehicle access. If a state does not have a vehicle inspection law that includes emission standards, then vehicles with license plates from those states should be denied access or charged appropriately higher entrance fees. That includes Wyoming, which currently does not have such a law for vehicle inspections at all.

14. Regrettable, but close the east entrance in winter.

Bad, do not pursue:

1. Establishment of more new snowmobile trails. Any new non-motorized trails should only be in non-invasive, wildlife friendly areas.
2. Any speeds for motorized vehicles over 35mph.
3. Plowed roads
4. No new CDST pathways
5. Continuance of vehicles with 2-stroke engines
6. No new staging areas/jumping off points to the south for snowmobile access. While I am not fond of the Flagg Ranch operation, I do not think that Vail Assoc. should be given preferential treatment over their long-term operation at Flagg, with a new level of facilities at Colter Bay. I do not wish to see a new pall of exhaust emanating from N. GTNP.
7. No plowing, minimized grooming of roads to preclude bison migration along roadbeds to exit the park and be killed.

Misc. Other

1. I don't understand the section, "Species of Special Concern" under Alt. F. Since when are trumpeter swans present in YNP in winter? Most have migrated to Jackson in early winter & fly further south as soon as the waters of Flat Creek freeze up.
2. I did not see any reference to any studies regarding carrying capacities of YNP as regards its wildlife charges. Further studies of their needs vrs. the wants of the general public, should be made & implemented. The public should never routinely be denied access, only as natural resources mgmt. dictates. And this does NOT apply to mgmt. designed to provide hunters and outfitters the increased ability to kill wildlife as a result of park pursuits.

Philosophically, it is not reasonable to assume that snowmachines can be eliminated from the park, at least not in the near term. I would very much like to see serious studies regarding mass transit, people movers(monorail), access reservations, etc., for both summer and winter, but especially now for winter access.

I would like to commend the park staffers, especially in light of direct criticisms, for their efforts in preparing the DEIS. Mistakes will often be made, so long as they aren't malicious to either side, but bring focus on the true problems our parks are facing.

I disagree with my friends at the FFA regarding the level of closure of YNP. I do not wish to see snowmobiles in the park any longer. Their irresponsible riders, pollution(noise & emission), the harassment of wildlife, the endangerment of park employees, their damage of

natural resources, their danger to one another, etc., are all items that must be corrected for the future well being of our natural heritage. However, winter access must be maintained for as many as facilities can accommodate, especially by means of mass transit. Perhaps one passenger access would have to be accommodated only by specially granted permits, even in summer.

In determining the preferred alternative for YNP or GTNP, the economic hardships presented to gateway communities, should not be the (or a consequential) determining factor. It will always be a political factor that must be considered, as politely & as minimally as possible. The NPS should only consider what is good & proper for the parks. That the gateway communities have been able to profit from their proximity to the parks all these years is fortunate for them. However, their prior good fortune can't be the yardstick for which future decisions for the parks are made. They will adapt. Outfitters will fall back, regroup, & eventually find a new way to profit from whatever position is adopted. The parks do NOT OWE them a living.

References in the options to clean air, solitude, quiet, safety, resource preservation, etc., should be the principal "driving" factors in NPS's decision of alternatives.

Thank you,

Walt Farmer

WALT FARMER

Pages 1-2 Re: Good initiatives to pursue and bad initiative not to pursue. Alternative formulation in this effort is highly complex. Many suggestions for alternatives or alternative features were made in the thousands of comments received. A great deal of criticism was leveled at the current range of alternatives because people did not like the way features were “mixed.” At the same time, many people focused on features of alternatives that they liked, and features to which they were opposed. It is clear that for such complex issues there could be an infinite number of possible alternatives. CEQ states that in such instances, the agency need only consider a reasonable number of examples that cover the full spectrum of possible alternatives that meet the purpose and need (Question 1b, CEQ 40 Most-Asked Questions). What constitutes a reasonable range depends on the nature of the proposal and the facts in each case, where the proposal is at the discretion of the agency.

The final selected alternative that is to be documented in a record of decision may mix features from the range of alternatives evaluated in the final EIS. Such mixing can occur as long as the mixed features are consistent with one another, and as long as the features and their effects would not fall outside the range of alternatives disclosed in the EIS (§1505.1(e)). A finding as to that circumstance would be entirely appropriate in the record of decision, along with the rationale, should the selected alternative not precisely correspond with one of the “mixes” evaluated in detail.

Conclusions drawn by commenters on “good” features versus “bad” features may be helpful to the decision maker. However, absent any rationale that would indicate a feature is not possible, all features will remain in the range of alternatives available for the decision. Most actions that are entertained within the range of alternatives have consequences one way or another, and these are disclosed to the necessary degree in the EIS.

Page 2. Re: Species of special concern. Please see page 125 in the DEIS. The species and its presence are of sufficient concern to address possible impacts.

Page 2. Re: Reference to studies regarding carrying capacity. Work accomplished by biologists on defining the wildlife affected environment and the effects of winter use on it are cognizant of the carrying capacity issue. Such determinations include many factors other than those associated with winter use. For this reason, NPS holds to its determination that setting, or determining, carrying capacities is beyond the scope of this effort (see page 16 in the DEIS). Steps are being taken to make the winter use EIS analysis as consistent as possible with that of the Bison EIS/Plan. NPS will clarify this issue as much as possible in the final document.

Pages 2-3. Re: Impacts of snowmobiles, and issues relating to safety, wildlife, natural resource damage, etc, are disclosed in the DEIS. The reader can note the differences in impact between the current condition (alternative A) and other alternatives that limit or eliminate snowmobile access in various areas of the parks. Alternative G provides for oversnow mass-transit access only. NPS feels that access to the national parks is a key element in the purpose and need for action, which is the major reason why total closure to motorized vehicles in the winter was considered but eliminated from detailed study.

Page 4. Re: Economic hardships to gateway communities should not be determining factor. The EIS presents a fair disclosure of impacts of winter use alternatives, including social and economic effects. There is no emphasis from NPS on economic impacts; the document and the process fulfil NEPA analysis requirements. It should be pointed out that cooperating agencies – primarily state and local government – are chiefly concerned about economic impacts on local communities and such concerns have been given due consideration. NPS is not responsible for the economic viability of the surrounding areas, but what NPS might propose to do is certainly an issue that must be addressed in the EIS. Consideration of impacts and other factors is in the purview of the decision maker, who will select an alternative and provide rationale for that selection in a record of decision. If certain uses are determined in the EIS to cause adverse impacts on park resources and values, and if it is further determined by the decision maker that such impacts are contrary to law, executive order, regulation and policy, then action must be taken. Mitigation that is necessary to reduce an impact to the appropriate level, or elimination to get rid of the impact entirely, could cause economic effects in local communities. NPS maintains that the proximity of such communities to the parks will always represent opportunities as well as risks for local businesses.